

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

KIMBERLEE WILLIAMS, ET AL.,

Plaintiffs,

v.

BASF CATALYSTS LLC, ET AL.,

Defendants.

Civil Action No: 11-cv-1754 (JLL) (JAD)

**STIPULATION OF VOLUNTARY  
DISMISSAL OF DEFENDANT  
GLENN A. HEMSTOCK.**

Whereas the parties acting through undersigned counsel agree to a voluntary dismissal of the Plaintiffs' claims against Defendant Glenn A. Hemstock, PhD ("**Hemstock**") pursuant to Federal Rule of Civil Procedure 41(a),

IT IS HEREBY STIPULATED AND AGREED:

1. Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A), Plaintiffs Kimberlee Williams, Nancy Pease, Marilyn L. Holley, Donna Ware, Donnette Wengerd and Rosanne Chernick (collectively "**Plaintiffs**") and Defendant Hemstock by and through the undersigned counsel, hereby stipulate that all claims asserted by Plaintiffs against Defendant Hemstock, and only those against Hemstock, are dismissed in their entirety without prejudice, with each party to bear its own costs.

2. In consideration for being voluntarily dismissed, Hemstock agrees that to the extent his health and circumstances reasonably permit he will cooperate with the remaining parties in providing, on notice to all parties, discoverable documents in his possession or control or testimony, including deposition testimony, without the necessity of being subpoenaed.

Dated: April 13, 2016

So stipulated and agreed:

/s/ Christopher M. Placitella

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*Attorneys for Defendant Glenn A. Hemstock*

**SO ORDERED BY THE COURT:**

Dated: April 14, 2016.

  
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HON. JOSE L. LINARES  
UNITED STATES DISTRICT JUDGE